

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KEISHA JONES,

Plaintiff,

-against-

**EQUIFAX, INC.
EXPERIAN INFORMATION SOLUTIONS, INC.,
TRANS UNION, LLC
BILATERAL CREDIT CORP, LLC
HAHNEMANN UNIVERSTIY HOSPITAL
COMCAST CABLE**

Defendants
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11 CV 9136 (CM) (KNF)

**DECLARATION OF
KEISHA JONES**

KEISHA JONES, declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am the plaintiff in this action.
2. I make this affidavit in opposition to Experian's motion for summary judgment.
3. I have been a repeated victim of identity theft since at least 2005.
4. On February 17, 2005 I filed a police report for the theft of my identity. After the identity thieves stole money from my Commerce Bank account in May 2005 I returned to the NYPD but the police told me not to file subsequent police reports since they involved the same theft of my identity and I already had an identity theft report on file. Therefore I never tried to file subsequent police reports when new accounts were opened in my name because of what NYPD told me.
5. Although I understand that I am not entitled to obtain actual damages in this matter because my reports were not viewed by a third party, the fact that Experian repeatedly

failed to properly reinvestigate the Central Financial Control and Comcast accounts and remove them from my credit report caused me a substantial amount of emotional distress. I have spent many years and likely hundreds of hours trying to remove fraudulent information from my credit and the fact that Experian refused to properly review these accounts added to my frustration of being a victim of identity theft. It also deterred me from applying for credit that I needed, and made it impossible for me to rent an apartment in my own name.

Dated: June 4, 2013

New York, NY

I DECLARE UNDER THE PENALTY OF
PERJURY THAT THE FOREGOING IS
TRUE AN CORRECT



KEISHA JONES